

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and for the
Estate of Bernard L. Madoff,

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro. No. 10-04658 (SMB)

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and for the
Estate of Bernard L. Madoff,

Plaintiff,

v.

CAROL NELSON, Individually and as Joint
Tenant; and STANLEY NELSON, Individually and
as Joint Tenant,

Adv. Pro. No. 10-04377 (SMB)

Defendants.

**DECLARATION OF DEAN D. HUNT IN OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

I, Dean D. Hunt, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Partner with the law firm of Baker & Hostetler LLP and counsel to the Trustee. I submit this declaration in opposition to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction.

2. Attached hereto as Exhibit A is a true and correct copy of the transcript of the Hearing re: Local Bankruptcy Rule 7007-1(b) Conference re: Letter of Chaitman LLP, dated June 26, 2019. *See Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec., LLC*, Adv. Pro. No. 08-01789 (SMB) (Bankr. S.D.N.Y. June 26, 2019), ECF No. 18863.

3. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 18, 2019
New York, New York

/s/ *Dean D. Hunt*
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for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*